

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**SHELBY LIGONS**

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)

**No. 3:20-CR-00161-2  
Judge Trauger**

**SHELBY LIGONS' SENTENCING POSITION  
AND MOTION FOR DOWNWARD DEPARTURE**

COMES the Defendant, SHELBY LIGONS, by and through undersigned counsel and hereby provides the following position with respect to the United States Sentencing Guideline calculation in the presentence investigation report (PSR) dated July 9, 2021.

Ms. Ligons' acknowledges that the guideline calculation by the U.S. Probation Office is accurate, however Ms. Ligons humbly suggests that several departures from her advisory sentencing guideline range may be appropriate. Ms. Ligons intends to move for a departure under the advisory sentencing guidelines, and for a sentencing variance pursuant to Title 18 U.S.C. section 3553(a), under the following:

Age (U.S.S.G. § 5H1.1)

Mental and Emotional Conditions (U.S.S.G. § 5H1.3)

Family Ties and Responsibilities (U.S.S.G. § 5H1.6).

For the record, Ms. Ligons raises these guideline departures here, but will address each in detail in her contemporaneously filed sentencing memorandum that will request variances under similar grounds.

Respectfully submitted,

s/ **Jodie A. Bell**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing Motion was filed electronically and served on the following:

Ben Schrader  
U.S. Attorney's Office  
Middle District of Tennessee  
Suite A-961, 110 Ninth Avenue South  
Nashville, Tennessee 37203

This the 12<sup>th</sup> day of July 2021.

/s/ Jodie A. Bell  
JODIE A. BELL